

# **EXHIBIT C**

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[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' FOURTH SET OF  
REQUESTS FOR PRODUCTION TO  
DEFENDANT META**

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 76**

Documents and Communications Concerning mandatory training titled “Legal” given to former employee Tim Dettmers while employed with Meta before December 2020.

**REQUEST FOR PRODUCTION NO. 77**

Communications Concerning any licensing copyrighted works that were used to train the Meta Language Models.

**REQUEST FOR PRODUCTION NO. 78**

Documents sufficient to show what the term “invite-only” means as used by Defendant in ECF No. 105.

1 Dated: August 29, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF SERVICE**

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1505, San Francisco, California 94108. I am over the age of eighteen and not a party to this action.

On August 29, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **PLAINTIFFS' FOURTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META PLATFORMS, INC.**

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 29, 2024.

  
\_\_\_\_\_  
Rya Fishman

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